



Glenn Springs Holdings, Inc.

A Subsidiary of Occidental Petroleum Corporation

Stephen E. Fitzgerald
Senior Environmental Counsel
Phone: (972) 687-7515

5005 LBJ Freeway, Suite 1350
Dallas, Texas 75244-5119
Fax: (713) 985-1371

July 25, 2014

Via E-Mail and Federal Express Overnight

Ms. Bonnie Hriczko
Removal Action Branch
U.S. Environmental Protection Agency
Region II
2890 Woodbridge Avenue, Bldg. 205 (MS-211)
Edison, New Jersey 08837

Re: Response to Request for Information Pursuant to Section 104(e) of CERCLA for the Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey (the "Site")

Dear Ms. Hriczko:

Glenn Springs Holdings, Inc., on behalf of its affiliate Occidental Chemical Corporation ("Occidental" or "Company"), hereby provides this letter response (the "Response") to the United States Environmental Protection Agency's ("USEPA") Request for Information, received June 17, 2014, pursuant to CERCLA §104(e) regarding the above Site (the "Request"). The Request was sent to an entity named "Occidental Chemical Holding." I believe USEPA intended to send the Request to the Company.

Subject to the objections herein, the Company conducted a search for any responsive information relating to the Site and the subject matter of the USEPA's Request. The Response does not include characterization or interpretation of any document included at Attachment "A" and does not include copies of documents provided to the Company by USEPA on June 25, 2014. USEPA set the response date as July 17, 2014, with an extension to July 25, 2014. The answers provided herein reflect information and knowledge of the Company as of the date of this letter. To the extent the Company has been able to locate in its possession non-privileged and relevant documents responsive to the Request, confidential copies are enclosed with the Response.



GENERAL OBJECTIONS

1. The Company objects to the Request to the extent it seeks information not calculated to discover relevant information.
2. The Company objects to the Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or rule that protects such information from disclosure.
3. The Company objects to the Request to the extent that it is unduly burdensome, oppressive, overbroad, and unreasonable.
4. In particular, and without limitation, the Company objects to the factual background given in the Request to the extent it presumes accuracy or requests an admission of information contained therein.
5. With regard to the documents attached hereto, the Company specifically preserves its right to establish the authenticity, relevance, credibility, reliability and accuracy of each original document and any information contained therein as provided by the Federal Rules of Evidence.

SPECIFIC OBJECTIONS TO DIRECTIONS

1. The Company objects to Direction 1 to the extent it requests privileged information.
2. The Company objects to Direction 9 to the extent it requires speculation.

SPECIFIC OBJECTIONS TO DEFINITIONS

1. The Company objects to Definition 3 to the extent it is unduly burdensome, overbroad and unreasonable. Therefore Responses are limited to the Company.

Without waiving the foregoing and subject to the additional specific objections set forth in the Company's individual responses, the Company responds as follows:

General Information about the Company Requested:

1. a. State the correct legal name of the Company.
Response: Occidental Chemical Corporation.
- b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.
Response: The Company is a corporation organized under the laws of the State of New York.

- c. State the name(s) and address(es) of the officer(s) of the Company.

Response: Company officers can be reached through Mr. Scott King, Vice President and General Counsel, Occidental Chemical Corporation, 5005 LBJ Freeway, Suite 2200, Dallas, TX 75244.

- d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

Response: The Company objects to this request to the extent it is overly broad, unduly burdensome, unreasonable, and not calculated to discover relevant information. Without waiving its objection, the Company states that it is a subsidiary of Occidental Chemical Holding Corporation. The Company has five wholly-owned domestic subsidiaries.

- e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.

Response: The Company was formerly named Hooker Electrochemical Company, Hooker Chemical Corporation and Hooker Chemicals & Plastics Corp.

- f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.

Response: The Company objects to request 1f on the ground that "SBD" is not defined in the Directions or Definitions sections of the Instructions. The Company further objects to this request to the extent that it presupposes that the Company transacted business with Superior Barrel and Drum Company, Inc. (hereinafter "Superior") at the Site. See Response 3a, *infra*. Without waiving its objection, the Company herein responds to request 1f by providing information and documents pertaining to Superior.

2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the changes that have occurred, including any name changes, and when they occurred.

Response: The Company is primarily a manufacturer of chlorine, caustic soda, vinyl chloride monomer, and polyvinyl chloride.

- b. Describe your Company's operations from 1974 to the present and identify all chemicals used or produced as a result of your Company's operations during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

Response: The Company objects to this request to the extent it is overly broad, unduly burdensome, and unreasonable. See Response to request 2a, above.

Company's Relationship to Superior Barrel and Drum Information Requested:

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

Response: The Company objects to request 3a on the ground that "SBD" is not defined in the Directions or Definitions sections of the Instructions. It is therefore unclear and ambiguous as to whether request 3a seeks information related to Superior Barrel and Drum Company, Inc. (which USEPA defines as "SBD" in the cover letter to this Request) or whether request 3a seeks information related to Superior's Elk Township, Gloucester County location, defined in the Request as the "Site." Without waiving its objections, the Company herein responds to request 3a by providing information and documents pertaining to the Company's transactions with the entity Superior.

The Company further objects to request 3a to the extent it presupposes that any transactions between the Company and Superior were for the disposal, treatment or storage of Containers at the Site. The Company did not conduct any business transactions with Superior for the disposal, treatment, or storage of any Containers at the Site. The Company engaged in certain business transactions with Superior for the recycling of empty containers without reference to the Site or any destination in the documents (produced herewith) reflecting the transactions.

The following additional comment is offered for USEPA's information: The Company's search for documents responsive to this Request located some documents reflecting Superior's transportation of Containers from the Company to unspecified sites. Other documents show undetailed payments made by Superior to the Company. Those documents do not establish that Containers were transported to the Site in Elk Township, Gloucester County, New Jersey. In fact, USEPA has conducted formal investigations into at least two other sites, i.e., the Metro Container Corporation site in Trainer, Pennsylvania, and the Martin Aaron, Inc. site in Camden, New Jersey. At each of those locations, USEPA concluded that Containers that were the subjects of transactional documents between the Company and Superior were sent to those sites. Any of the invoices, payments or bills of lading produced in response to request 3a may in fact relate to the Metro Container Corporation site or the Martin Aaron, Inc. site. The Company cannot, therefore, identify any business transactions for Containers that were sent to the Site, i.e., the Elk Township, Gloucester County facility.

Preserving and notwithstanding the objections detailed above, the Company attaches a Summary Table of Documents at Attachment "A" and documents (Bates Nos. SBD 000001 through SBD 000055).

- b. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company.
Response: The Company's former Lower Pottsgrove, Pennsylvania facility contracted with Superior for the recycling of empty drums.
- c. Provide copies of any contracts or agreements between the Company and SBD.
Response: See Response to request 3a, and documents attached (Bates Nos. SBD 000001 through SBD 000055).
4. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated.
Response: The Lower Pottsgrove, Pennsylvania facility was a PVC manufacturing facility during the relevant time period. The facility discontinued manufacturing operations in 2005.
- b. State the name, address and current RCRA Identification Number of each facility.
Response: Occidental Chemical Corporation, Armand Hammer Boulevard, Lower Pottsgrove, PA 19464; RCRA No. PAD002334753.
5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.
- a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year.
Response: See Response to request 3a above. Other than stated in the Response to request 3a above, after diligent inquiry the Company has not located information or knowledge responsive to this request.
- b. Identify the number of Containers that were the subject of each such transaction.
Response: See Response to request 3a above. Other than stated in the Response to request 3a above, after diligent inquiry the Company has not located information or knowledge responsive to this request.
- c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.).
Response: See Response to request 3a and documents attached. Other than stated in the Response to request 3a above, after diligent inquiry the Company has not located information or knowledge responsive to this request.
- d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or from the Company, to or from SBD, etc.).

Response: The intended purpose of each transaction was the recycling of empty drums. See also, Response to request 3a above. Other than stated in the Response to request 3a above, after diligent inquiry the Company has not located information or knowledge responsive to this request.

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:

Response: Each transaction was for the recycling of empty drums. See also, Response to request 3a above. Other than stated in the Response to request 3a above, after diligent inquiry the Company has not located information or knowledge responsive to this request.

- (1) Identify each such substance, including its specific chemical constituents(s), physical state, quantity by volume and weight, and other characteristics; and

Response: See Response to request 5e above. Other than stated in the Response to request 5e above, after diligent inquiry the Company has not located information or knowledge responsive to this request.

- (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

Response: See Response to request 5e above.

6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

Response: The Company objects to this request to the extent it is vague, ambiguous, unreasonable, and calls for speculation. See Response to request 3a above and attached documents.

7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

Response:

Michael Shirey, HES Manager, Occidental Chemical Corporation, Houston, Texas.

David Madeira, Project Manager, Glenn Springs Holdings, Inc., Pottstown, Pennsylvania

Bert A. Walker, formerly Site Services Superintendent for Occidental Chemical Corporation at the Lower Pottsgrove, Pennsylvania facility.

Investigation is continuing.

8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:

- a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and
- b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

Response: The Containers provided to Superior by the Company were empty drums. The drums had previously contained raw materials delivered to the Company's Lower Pottsgrove, Pennsylvania facility. The Company has no specific information or knowledge as to the prior raw material content of any Container provided to Superior.

9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.

Response: Containers were emptied of raw materials during manufacturing operations or subsequently. As appropriate, Containers were rinsed and/or steam-cleaned prior to removal by Superior. See Response to request 3a above.

10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

Response: See Response to request 3a above. Other than stated in the Response to request 3a above, after diligent inquiry the Company has not located information or knowledge responsive to this request.

11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.

Response:

Michael Shirey (requests 3, 7, 8, 9)

David Madeira (requests 3 and 7)

Bert A. Walker (requests 3, 7, 8, 9)

12. Identify any other person or entity (e.g., individual, company, partnership, etc.) having knowledge of facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address and telephone number of that person, and the basis of your belief that he or she has such knowledge. For past and present employees, include their job title(s) and a description of the responsibilities.

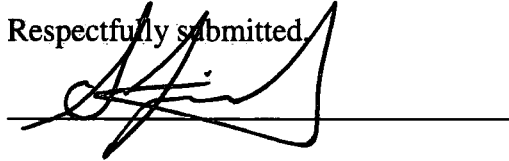
Response: None. Investigation is continuing.

Ms. Bonnie Hriczko
July 25, 2014

13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

Response: None.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Fitzgerald', is written over a horizontal line.

STEPHEN E. FITZGERALD
Senior Environmental Counsel
Glenn Springs Holdings, Inc.
5005 LBJ Freeway, Suite 1350
Dallas, Texas 75244-5119

cc: William Tucker via email at tucker.william@epa.gov

Ms. Bonnie Hriczko
July 25, 2014

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

STATE OF TEXAS

COUNTY OF DALLAS

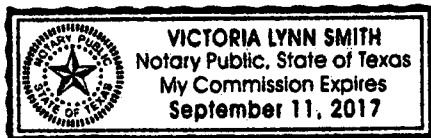
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME: Stephen E. Fitzgerald

TITLE: Sr. Environmental Counsel

SIGNATURE: [Signature]

SWORN TO BEFORE ME THIS 25 day of July, 2014.



Victoria Lynn Smith
Notary Public in and for the State of Texas

ATTACHMENT “A”

SUMMARY TABLE OF DOCUMENTS PRODUCED

09/05/1984	Invoice from Superior to the Company		SBD 000001
10/10/1984	Invoice from Superior to the Company	The Company consigned to Superior 234 drums.	SBD 000002
06/11/1986	Invoice from Superior to the Company	The invoice references 381 "empty" open head drums.	SBD 000003
06/12/1986	Check from Superior to the Company	Payment of \$285.75	SBD 000003
12/09/1986	Invoice from Superior to the Company	The invoice references 282 "empty" open head drums.	SBD 000004
12/09/1986	Check from Superior to the Company	Payment of \$211.50	SBD 000004
02/28/1987	Invoice from Superior to the Company	The invoice references 126 "empty" drums.	SBD 000008
02/28/1987	Check from Superior to the Company	Payment of \$94.50	SBD 000008
04/23/1987	Invoice from Superior to the Company	The invoice references 193 "empty" drums.	SBD 000007
04/23/1987	Check from Superior to the Company	Payment of \$144.75	SBD 000007

05/19/1987	Invoice from Superior to the Company	The invoice references 159 "empty" drums.	SBD 000006
05/19/1987	Check from Superior to the Company	Payment of \$119.25	SBD 000006
06/29/1987	Invoice from Superior to the Company	The invoice references 80 "empty" drums.	SBD 000005
06/29/1987	Check from Superior to the Company	Payment of \$60.00	SBD 000005
09/24/1987	Invoice from Superior to the Company	The invoice references 162 drums.	SBD 000009
09/24/1987	Check from Superior to the Company	Payment of \$121.50	SBD 000009
11/23/1987	Invoice from Superior to the Company	The invoice references 234 "empty" drums.	SBD 000010
11/23/1987	Check from Superior to the Company	Payment of \$175.50	SBD 000010
12/23/1987	Invoice from Superior to the Company		SBD 000011
12/23/1987	Check from Superior to the Company	Payment of \$304.50	SBD 000011
01/19/1988	Invoice from Superior to the Company		SBD 000012
01/26/1988	Invoice from Superior to the Company		SBD 000012

02/10/1988	Invoice from Superior to the Company		SBD 000013
02/xx/1988	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000014
02/21/1988	Invoice from Superior to the Company		SBD 000015
02/22/1988	Check from Superior to the Company	Payment of \$227.50	SBD 000015
02/25/1988	Invoice from Superior to the Company		SBD 000016
04/12/1988	Invoice from Superior to the Company	The invoice references 217 drums.	SBD 000017
04/12/1988	Check from Superior to the Company	Payment of \$175.50	SBD 000017
04/28/1988	Invoice from Superior to the Company		SBD 000018
04/28/1988	Check from Superior to the Company	Payment of \$168.25	SBD 000018
05/17/1988	Invoice from Superior to the Company	The invoice references 234 drums.	SBD 000019
06/14/1988	Invoice from Superior to the Company	The invoice references 234 drums.	SBD 000020
06/14/1988	Check from Superior to the Company	Payment of \$87.50	SBD 000020

06/28/1988	Invoice from Superior to the Company		SBD 000021
06/28/1988	Check from Superior to the Company	Payment of \$125.50	SBD 000021
08/01/1988	Check from Superior to the Company	Payment of \$150.00	SBD 000022
09/29/1988	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000023
09/29/1988	Check from Superior to the Company	Payment of \$106.06	SBD 000024
10/12/1988	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000025
11/29/1988	Invoice from Superior to the Company	The invoice references 222 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations .	SBD 000026
11/29/1988	Check from Superior to the Company	Payment of \$136.50	SBD 000026
02/26/1989	Invoice from Superior to the Company		SBD 000027
02/26/1989	Check from Superior to the Company	Payment of \$42.50	SBD 000027
05/05/1989	Invoice from Superior to the Company	The invoice references 238 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000028

05/05/1989	Check from Superior to the Company	Payment of \$90.00	SBD 000028
05/11/1989	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000029
06/13/1989	Invoice from Superior to the Company	The invoice references 265 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000030
08/10/1989	Invoice from Superior to the Company	The invoice references 52 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000031
09/12/1989	Invoice from Superior to the Company	The invoice references 170 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000032
10/12/1989	Invoice from Superior to the Company	The invoice references 107 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000033
12/05/1989	Invoice from Superior to the Company	The invoice references 228 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000034
12/15/1989	Check from Superior to the Company	Payment of \$78.50	SBD 000034
02/01/1990	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000035
02/20/1990	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000036

03/01/1990	Invoice from Superior to the Company	The invoice references 226 drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000037
04/18/1990	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000038
05/16/1990	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000039
09/25/2003	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000040
10/10/2003	Straight Bill of Lading	The Company consigned to Superior 140 used drums.	SBD 000041
10/28/2003	Straight Bill of Lading	The Company consigned to Superior 120 used drums.	SBD 000042
11/12/2003	Straight Bill of Lading	The Company consigned to Superior 120 used drums.	SBD 000043
11/20/2003	Invoice from Superior to the Company	The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000044
12/2003	Straight Bill of Lading	The Company consigned to Superior 174 used drums.	SBD 000045
02/06/2004	Purchase Order	The Company contracted with Superior to recycle a trailer of "empty" drums.	SBD 000046 through SBD 000049
02/10/2004	Straight Bill of Lading	The Company consigned to Superior 182 used drums.	SBD 000050

02/10/2004	Invoice from Superior to the Company	The invoice references 182 "empty" used drums.	SBD 000051
12/19/2006	Invoice from Superior to the Company	The Company consigned to Superior 174 used drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000052
Date Illegible	Invoice from Superior to the Company		SBD 000053
Undated	Straight Bill of Lading	The Company consigned to Superior 110 used drums.	SBD 000054
Undated	Invoice from Superior to the Company	The Company consigned to Superior 90 used drums. The Company certified that the drums are "empty" pursuant to USEPA regulations.	SBD 000055



New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

№ 5974

P. O. No

Date _____

[illegible]

SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

REF 000410

P. O. No. _____

Date / /

Box 2100

[illegible]

SBD_000002

H.F.

#1	74
#2	107

Scarf 53

Oct 10, 1984
12:15 Pm.

Donated by



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

3075

55-326
312

**PAY
TO THE
ORDER OF**

President Chen

DESCRIPTION	AMOUNT	CURRENCY
1000 hundred eighty five dollars	1000	DOLLARS
	85	CENTS
	00	
	100	

DOLLARS

THIS CHECK IS DIVIDED FOR PAYMENT ON THE ACCOUNTS 1051



SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

P.O. No

Date _____

Cricket Chemical

[illegible]

Received by



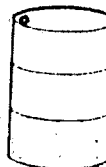
3447

53-328
912

DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

11-32-02 15:01 4.7500



New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

No. 6009

P. O. No

Date _____

Occidental Chem.
Pittsburg Pa

[illegible]

719

106 South Broadway, Pittman, N.J. 0807

**PAY
TO THE
ORDER OF**



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

343

1909 0291987

55-326
312

\$ 119-25 100
DOLLARS

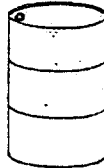
DOLLARS

550

119	25
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THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

"003731" + "12032611" "405 249 4"



SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

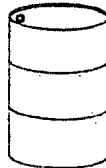
NO 5590

P. O. No.

Date _____

Kirkland Tall Church
Jill P.
Hillman Pa

[illegible]



New - Used - Reconditioned

(609) 589-6593

P. O. No. 3602

Date 28 Feb 87

100 5511

Ch. H. G. G.
H. H. G. G.

[illegible]

Harvard K. F. 100

National Bank 
and Trust Company of **Gloucester County**
106 South Broadway, Pitman, N.J. 08071

PAY
TO THE
ORDER OF



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

3602

55-326

28 Feb 1987

94.50

-DOLLARS

PAY
TO THE
ORDER OF *Gaslin H Co*
Ninety four Dollars + 50/100

6511 97/59

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

003602 31203261 405 249 4

Sept 24, 1987



Wickham Chemical
Pittston Pa

[illegible]

50
152

11. 6' 72.50".

National Bank 
and Trust Company of Gloucester County
MEMBER FDIC
125 South Broadway, Pittman, N.J. 08071



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

3938

PAY
TO THE
ORDER OF

PAY TO THE ORDER OF Donald H. Brown \$20

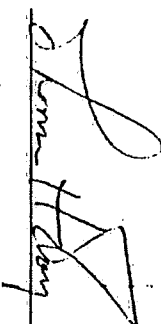
\$121.50

-DOLLA

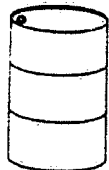
245046-187

55-312

Received by



Received by



SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 588-6593

No. 6339

P. O. No.

Date _____

Wendell
Patterson

[illegible]

Received by _____



SUPERIOR

Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

6365

P. O. No.

Date

10 Feb 88

Don't let them

Quantity	Description	Amount
6	#1 H.F.	12.00
12	#2 H.F.	18.00
49	#2 O.H.	24.50
		54.50
8	Scrap	56.00
		1.50

Received by



SUPERIOR

Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

6349

P. O. No.

Date

7/21

7-1-88

Don't let them

Quantity	Description	Amount
115	#1 O.H. .75	86.25
33	#2 O.H. .50	16.50
7	Scrap .75	5.25
7	Marked Drum	
	Pruned to spec	24.00
	Pilot Plant	
	Drums 7.00	
	Cost as per	
	to get rid of	
	them	

Received by

NAME _____

ADDRESS

CITY

STATE

ZIP

DATE _____

CUSTOMER PO

[illegible]

REC'D.

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name _____

Signature

*With regard to most regulated residues, EPA's 40 CFR 261.7 says:

"A container...is empty if:

(i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating.

and

(II) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container. . ."

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it **cannot be removed** by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container...has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

****DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.**

"DEALER IN STEEL DRUMS"



SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

P. O. No.

4175

Date

21 Feb 88

6370

Mr. Robert Kimball
218 Crafton Avenue
Pitman, N.J.

Quantity	Description	Amount
50	2" H.F.	71.00
50	2" H.F.	16.00
101	2" H.F.	151.50
45	2" H.F.	71.00
		227.50

National Bank
 of New Jersey
 100 South Broadway, Pitman, N.J. 08071



SUPERIOR BARREL & DRUM CO., INC.

218 CRAFTON AVENUE
 PITMAN, NEW JERSEY 08071

4175

PAY
 TO THE
 ORDER OF

Accidental

22 Feb 88

55-326
 312

\$ 227.50

Two hundred twenty seven and 50/100

DOLLARS

6370

227.50

John H. Bay

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

⑈0001275⑈ ⑆031203261⑆ ⑈405 249 4⑈

New - Used - Reconditioned

(609) 589-6593

P. O. No.

Date _____

11. Golden Lark

[illegible]

Received by _____

Received by _____Received by _____

DOLLARS

National Bank 
an Equal Opportunity Lender
Gloucester County
100 North Broadway, P.O. Box 100
Gloucester, NJ 08045



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

4439

**PAY
TO THE
ORDER OF**

100

BOLLARS

25/5/5

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

11 4 472 507.0 11 922 602 750.1 11 634 700.11

James H. Dyer



SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

6092

P. O. No. _____

Date Oct 30 1935

Occident
Millenium

Quantity	Description	Amount
31	#1 H.F. 2	62
22	#2 H.F. 1	33
61	#201H	30
120	Scrap 1/2	125

Received by _____

National Bank
 and Trust Company of Gloucester County
 100 South Broadway, Freeport, N.J. 08071

4496

SUPERIOR BARREL & DRUM CO., INC.
 218 CRAFTON AVENUE
 PITMAN, NEW JERSEY 08071

55-326
312

1 Accy

PAY TO THE ORDER OF
One hundred fifty dollars

\$ 150.00

DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNT'S LISTED

11001196 120312032611 1105 249 11

Shunt Key

32 #1, 64.00
 41 #2 61.50
 15 #10H. 12.00
 26 #201H. 13.00
 115
 117 Scrap.
 232

150.50
 21C

PA
ms



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Occidental Chem Co
ADDRESS Grand Haven Blvd
CITY Pottitum STATE Pa ZIP 19464

DATE 29 Sept 88

CUSTOMER PO 4613 ek#

QUANTITY	DESCRIPTION	PRICE	AMOUNT
32	#1 W.F.	2 ⁰⁰	64 ⁰⁰
131	Line W.F.	N/C	—
69	Scrap	N/C	—
28	#2 W.F.	1 ⁵⁰	42 ⁰⁰
			106 ⁰⁰
	Pack 4613		

REC'D. [Signature]

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name L. Shiller

Signature [Signature]

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and

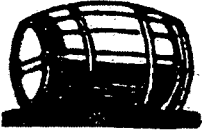
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

4613

FIRST FIDELITY BANK, N.A. South Jersey
Pitman Office
106 South Broadway
Pitman, NJ 08071
912

PAY
TO THE
ORDER OF

Occidental

One hundred and ten

106⁰⁰

Shuntz

\$ *106⁰⁰*

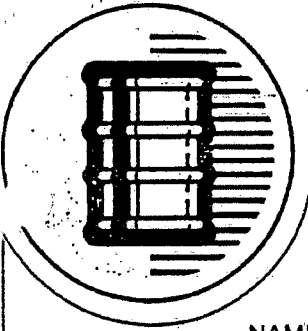
DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

⑈004613⑈ ⑆031201467⑆ 003 405249 4⑈

55-148
312

SEP 000026 *Ted*



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME *Accidental*

ADDRESS _____

CITY *Pittston* STATE *Pa* ZIP _____

DATE *12 Oct 88*

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
31	<i>Empty Drums #1</i>	<i>2.00</i>	<i>62.00</i>
48	<i>Empty H 2</i>	<i>1.50</i>	<i>72.00</i>
84	<i>Lid H.F.</i>	<i>N/C</i>	<i>1.00</i>
<i>56</i>	<i>Scraping</i>	<i>N/C</i>	<i>1.00</i>
<i>15</i>	<i>Drums Rinsed for disposal</i>	<i>8.00</i>	<i>120.00</i>
<i>23</i>	<i>Superior Own Drum</i>	<i>7.00</i>	<i>161.00</i>
<i>EX 9241</i>	<i>From Plastics</i>		
<i>Charge them \$120.00 to get rid of drums</i>			

They could avoid this charge if they change types of Drums

REC'D. *FF Day*

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name *R. N. Shollenbarger*

Signature *R. N. Shollenbarger*

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and

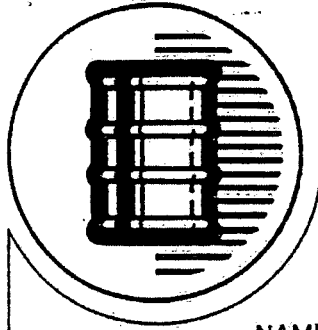
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Occident Co

ADDRESS _____

CITY Pittman STATE Pa ZIP _____

DATE 29 Nov 88

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
36	#1 H.F.	200	72 00
43	#2 H.F.	150	64 50
68	Kind 1 H.F.	N/C	
43	Scrap	N/C	
32	Hastic - N/C	N/C	
22			136 50

REC'D. TH

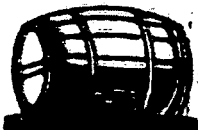
EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name RN Shultz

Signature RN Shultz

FIRST FIDELITY BANK, N.J. South Jersey
Pitman Office
1000 Broadway
Pitman, NJ 08071



SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

475

PAY
TO THE
ORDER OF

Occident Co
One hundred thirty six and 50/100

290d 1988
\$ 136 50
DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

Shultz

⑈004754⑈ -⑈031201467⑈ 003 405249 4⑈

218 CRAFTON AVENUE, PITMAN, N.J. 08071

(609) 589-6593

NY 006389

P. O. No.

Date

Oriental

Tollman

Quantity	Description	Amount
28	#1 H.F. 200	54.00
39	#2 H.F. 150	58.00
91	1 ind H.F. all c	114.50
241	Scrap all c	
125		
9	Plastic mount Lind 8 th	72.00
	pg #2	42.50

Received by _____

SUPERIOR BARREL & DRUM CO., INC.
218 CRAFTON AVENUE
PITMAN, NEW JERSEY 08071

4932

-DOLLARS

SC 42-1002
DOLL

2022

65-146
312

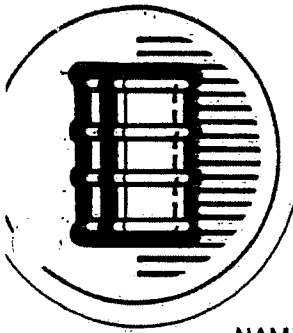
0049-8-H:031201467: 003 405249 4

Don H. Hart

42

10207

DAY
AND THE
NUMBER OF
PAGES OF
THE
REPORT
+ 50



SUPERIOR BARREL AND DRUM CO. INC.
 218 CRAFTON AVE • PITMAN, NJ 08071 • (609) 589-6593

NAME Francis J. [Signature]

ADDRESS _____

CITY PitmanSTATE Pa

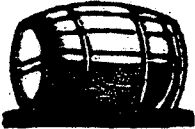
ZIP _____

DATE 5 May 89CUSTOMER PO 5051

QUANTITY	DESCRIPTION	PRICE	AMOUNT
21	4 1 H.T.	2 ⁰⁰	42 ⁰⁰
32	2 2 H.T.	1 ⁵⁰	48 ⁰⁰
1/8	Lined	N/C	
67	Scrap	N/C	
238			90 ⁰⁰

REC'D. [Signature]**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name Richard N. Schellberg

SUPERIOR BARREL & DRUM CO., INC.
 218 CRAFTON AVENUE
 PITMAN, NEW JERSEY 08071

5051

PAY TO THE ORDER OF

Ninety Dollars & 00/100Francis J. [Signature] 5 May 89 90⁰⁰5 May 1989\$ 90⁰⁰

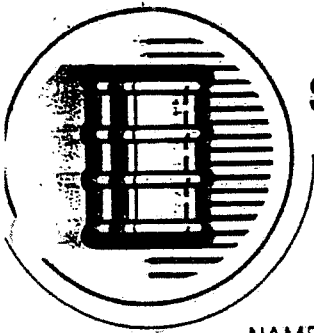
DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED:

⑈005051⑈ ⑆031201467⑆ 003 405249 4⑈

FIRST FIDELITY BANK, N.A. South Jersey
 100 South Broadway
 Pitman, NJ 08071

55-146
312



SBD_000029

SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Accident Chem

ADDRESS _____

CITY PittmanSTATE Pa

ZIP _____

DATE 11 May 89

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
38	Hester Hm Kessel		
45	30 gal Drum Kessel	N/C	
1			

REC'D. TH**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name Richard W. SchaefferSignature R. W. Schaeffer

*With regard to most regulated residues, EPA's 40 CFR 261.7 says:

"A container... is empty if:

(I) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating.

and

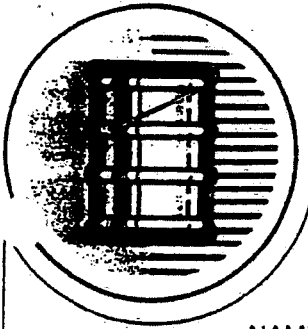
(II) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container..."

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container... has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME

ADDRESS

CITY

STATE

ZIP

DATE

CUSTOMER PO

QUANTITY	DESCRIPTION	PRICE	AMOUNT
16	Waste steel drums Poured for disposal	8 ⁰⁰	128 ⁰⁰
	Waste		
14	#1 H.F.	2 ⁰⁰	28 ⁰⁰
34	#2 H.F.	1 ⁵⁰	51 ⁰⁰
64	Line H.F.	N/C	
98	#2 O.H.	5 ⁰⁰	49 ⁰⁰
39	Scrap	N/C	
265			128 ⁰⁰

REC'D.

EMPTY DRUM CERTIFICATION

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Print Name

Signature

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"DEALER IN STEEL DRUMS"

NAME Walter A. Brown

ADDRESS _____

CITY Atlanta STATE Ga ZIP 30308

DATE 10 May 89

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
8	H.L. #1	2.00	16.00
10	H.L. #2	1.50	15.00
5	H.L. #3	5.00	25.00
			46.00
16	10 gal. 3-in. - 1-in.		
	Excess Material		
2			

REC'D. *77 May*

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name John Doe

Signature _____

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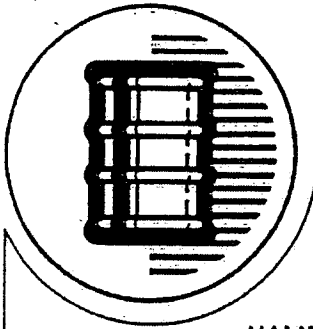
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
 218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Carroll

ADDRESS _____

CITY PittmanSTATE Pa

ZIP _____

DATE 12/5/89CUSTOMER PO Cash

QUANTITY	DESCRIPTION	PRICE	AMOUNT
3	#1 D.F.	200	600
5	#2 D.F.	150	750
21	#2 C.I.H.	50	1050
			2400
14	Lined I.H.F.	NIC	
67	Sand	NIC	
170	For Cash		2400

REC'D. ATC**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name _____

Signature L. J. Schell

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and

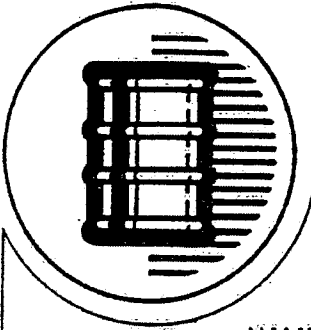
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
 218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Donald H. Daniel

ADDRESS _____

CITY PittmanSTATE Pt

ZIP _____

DATE 12 Dec 89CUSTOMER PO Cash

QUANTITY	DESCRIPTION	PRICE	AMOUNT
22	014 #2	50	11.00
31	Lined H.F.	N/C	
54	Scrap	N/C	
107			

REC'D. DTB**EMPTY DRUM CERTIFICATION**

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Print Name RN SchickSignature RN Schick

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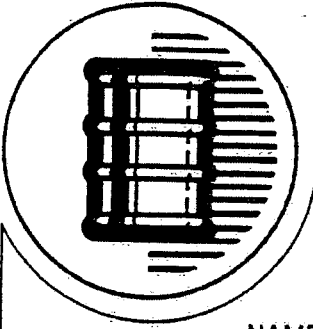
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
 218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Pittman

ADDRESS _____

CITY Pittman STATE Pa ZIP _____DATE 5/26/89CUSTOMER PO 2433

QUANTITY	DESCRIPTION	PRICE	AMOUNT
21	#1 U.F.	200	12 00
20	2	1 50	26 00
1	214	50	5 00
1	ind. U.F.	N/C	—
1	Scrap	N/C	—
22			78 00

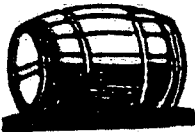
REC'D. CH**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name CH

5433

FIRST FIDELITY BANK, South Jersey
 Pitman Office
 100 South Broadway
 Pitman, NJ 08071



SUPERIOR BARREL & DRUM CO., INC.
 218 CRAFTON AVENUE
 PITMAN, NEW JERSEY 08071

PAY TO THE ORDER OF

Occident Ch
Seventy eight dollar + 50

151289

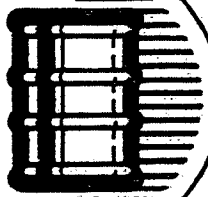
78 50

CH
Hoy

\$ 78 50

DOLLA

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED
 ⑈005433⑈ ⑆031201467⑆ 003 405249 4⑈



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Cockinathim

ADDRESS _____

CITY PittmanSTATE Ta

ZIP _____

DATE 1 Feb 90

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
14	H.F.	2.00	28.00
35 70	O.H.	3.00	105 210
100	Lined H.F.	1.18	118.00
50	Scrap	.17	8.50
5	2 TUNE Heads Chopped for liquid	8.00	118.00
			0.00

REC'D. PHG**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name Richard N SchellingerSignature R. N. Schellinger

*With regard to most regulated residues, EPA's 40 CFR 261.7 says:

"A container... is empty if:

(I) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating.

and

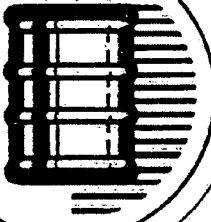
(II) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container..."

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container... has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME Cceduto-kun

ADDRESS _____

CITY PittmanSTATE Pa

ZIP _____

DATE 20 Aug 90

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
100	#2 D14	50	50 00
11	#1 H.F.	2 00	22 00
43	lined H.F.	NIC	—
10	Scrap	NIC	—
214			72 00
9	Drum to be disposed of	8 00	- 72 00
			- 0 -

REC'D. Off Day**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name J N SchellhaasSignature J N Schellhaas

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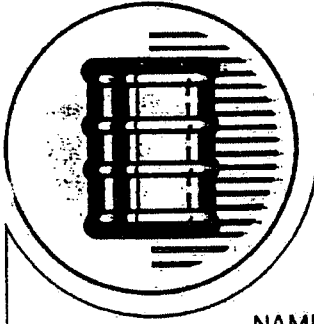
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

#OC030190

NAME Accidental Chemical

ADDRESS _____

CITY Pottstown STATE Pa. ZIP _____DATE 3-1-90

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
198	Scrap Chemical Drums Removed from Chemical Scrap	00	0 00
28	Scrap Chemical Drums Removed from Hestics Dept		
All Drums "DRY PROCESS ONLY"			

REC'D. _____

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name Richard N SchilleSignature R N Schille

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and

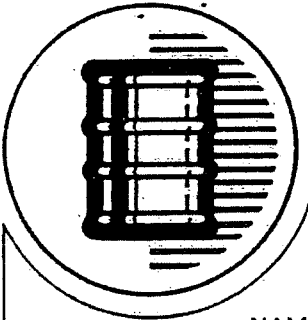
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
 218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME C. A. Schellhammer

ADDRESS _____

CITY Pittman STATE Pa ZIP _____DATE 18 April 90

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
8	1 Junk Drum removed & cleaned	8.00	64.00
	Red ink		
7	#1 H.F.	2.00	14.00
21	#2 H.F.	1.50	31.50
37	#2 O.H.	.50	18.50
3			14.00
			64.00
			100.00

REC'D. THF**EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name P. J. SchellhammerSignature P. J. Schellhammer

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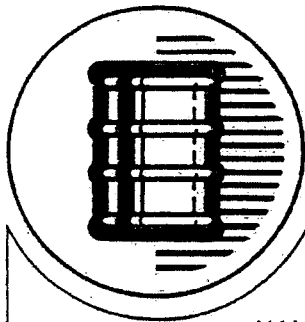
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"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
 218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME

ADDRESS

CITY

STATE

ZIP

DATE

CUSTOMER PO

QUANTITY	DESCRIPTION	PRICE	AMOUNT
21	#2 H.F	150	31 50
33	#7 OIH	50	16 50
63	L.H.F	N/C	N/C
37	56	N/C	N/C
			48 00
6	Scrap Barrel for disposal	80	48 00
			- 0 -

REC'D.

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name

Signature

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"DEALER IN STEEL DRUMS"

CITY San Jose STATE CA ZIP 95128

CUSTOMER PO

[illegible]

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.28."

Signature Donald B. Smith

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"DEALER IN STEEL DRUMS"

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable
RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

PLANT SHIPPING

 Carrier Must Show Shipper's
 I.D. No. on all Freight Bills

SHIPPED FROM:

 OCCIDENTAL CHEMICAL CORP.
 ARMAND HAMMER BLVD.
 POTTSTOWN, PA - 19464

CUSTOMER P.O.

SHIPPER'S I.D. NO.

SR-0004160

DATE SHIPPED

10/10/03

Subject to Section 7 of Conditions of applicable bill of lading, when a shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
(Signature of Consignor)
[Signature]

 CONSIGNED TO: (Name or Street Address of Consignee-For purpose of notification only)

 SUPERIOR BARRELL & DRUM CO.
 P.O. BOX 741
 GLASSBORO, NJ 08028

1-609-881-5866

SOLD TO:

FREIGHT CHARGES

MAIL FREIGHT BILLS TO:

 OCCIDENTAL CHEMICAL CORP.
 FREIGHT PAYMENT CENTER
 P.O. BOX 809050
 DALLAS, TX 75380

ROUTING AND CARRIER INSTRUCTIONS:

THEIR PICK UP

GROSS		TARE		SHIPPING WEIGHTS		TEST*	SEAL NO./SHIPPING MARKS	CAR VEHICLE OR CONTAINER INITIALS & NO.
				NET				
ITEM	H/M	PACKAGE		SHIPPING DESCRIPTION				
		NO. OF	DESCRIPTION					
TYPES OF DRUMS #1 HEADFILLER 20 GAUGE LINED #2 HEADFILLER 20 GAUGE LINED #1 OPEN HEAD 20 GAUGE LINED #2 OPEN HEAD 20 GAUGE LINED SCRAP ESTIMATED TOTAL NO. <u>140</u> USED METAL DRUMS <i>Full Trailer</i>								

 See Reverse Side for Bill of Lading Information
 This is to certify that the above-named materials are properly
 classified, described, packaged, marked and labeled, and are in
 proper condition for transportation, according to the applicable
 regulations of the Department of Transportation.
 SHIPPER

 FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT)
 CALL CHEMTREC DAY OR NIGHT: 1-800-424-9300 IN US, PUERTO RICO,
 CANADA, VIRGIN ISLANDS SR 202-483-7816 COLLECT

PLACARDS IF APPLICABLE, WERE FURNISHED/AFFIXED.

If car is bad order, Please call 1-800-23-1070 between 9:00 A.M. and 4:00 P.M. Central Time.

CARRIER

PER:

DATE 10/10/03

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable
RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

PLANT SHIPPING

 Carrier Must Show Shipper's
 I.D. No. on all Freight Bills

 SHIPPED FROM:
 OCCIDENTAL CHEMICAL CORP.
 ARMAND HAMMER BLVD.
 POTTSTOWN, PA 19464
 CUSTOMER P.O.
 B. WALKER

SHIPPER'S I.D. NO.

SR-0004166

DATE SHIPPED

10/28/03

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

FREIGHT CHARGES

CONSIGNED TO: (Mail or Street Address of Consignee-For purpose of notification only)

 SUPERIOR BARRELL & DRUM Co.
 P.O. BOX 741
 GLASSBORO, NJ 08028
 1-609-881-5866

MAIL FREIGHT BILLS TO:

 OCCIDENTAL CHEMICAL CORP.
 FREIGHT PAYMENT CENTER
 P.O. BOX 809050
 DALLAS, TX 75380

SOLD TO:

ROUTING AND CARRIER INSTRUCTIONS:

THEIR PICK UP

GROSS		TARE		NET		TEST	SEAL NO./SHIPPING MARKS	CAR VEHICLE OR CONTAINER INITIALS & NO.
ITEM	H/M	PACKAGE		NO. OF DESCRIPTION		SHIPPING DESCRIPTION		
TYPES OF DRUMS #1 HEADFILLER 20 GAUGE LINED #2 HEADFILLER 20 GAUGE LINED #1 OPEN HEAD 20 GAUGE LINED #2 OPEN HEAD 20 GAUGE LINED SCRAP ESTIMATED TOTAL NO. <u>20</u> USED METAL DRUMS								

 See Reverse Side for Bill of Lading Information
 This is to certify that the above-named materials are properly
 classified, described, packaged, marked and labeled, and are in
 proper condition for transportation, according to the applicable
 regulations of the Department of Transportation.

SHIPPER

 FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT)
 CALL CHEMTREC DAY OR NIGHT 1-800-424-9300 IN U.S. PUERTO RICO,
 CANADA, VIRGIN ISLANDS OR 202-483-7616 COLLECT

PLACARDS IF APPLICABLE, WERE FURNISHED/AFFIXED.

 If car is bad ~~carrier~~ Please call 1-800-767-1070 between 9:00 A.M. and 4:00 P.M. Central Time.

CARRIER

PER:

DATE

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable
RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

PLANT SHIPPING

Carrier Must Show Shipper's
I.D. No. on all Freight Bills

SHIPPED FROM: OCCIDENTAL CHEMICAL CORP. ARMAND HAMMER BLVD. POTTSTOWN, PA 19464		SHIPPERS I.D. NO. SR-0004164	DATE SHIPPED 11-12-03
CUSTOMER P.O.	B. WALKER	Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.	
CONSIGNEE TO: (Mail or Street Address of Consignee-For purpose of notification only) SUPERIOR BARRELL & DRUM CO. P.O. BOX 741 GLASSBORO, NJ 08028 1-609-881-5866		FREIGHT CHARGES <i>Stanley G. Gienewski</i> (Signature of Consignor)	
SOLD TO:		MAIL FREIGHT BILLS TO: OCCIDENTAL CHEMICAL CORP. FREIGHT PAYMENT CENTER P.O. BOX 809050 DALLAS, TX 75380	

ROUTING AND CARRIER INSTRUCTIONS:

THEIR PICK UP

GROSS		TARE		SHIPPING WEIGHTS		TEST		SEAL NO./SHIPPING MARKS	CAR VEHICLE OR CONTAINER INITIALS & NO.
ITEM	H/M	PACKAGE NO.	DESCRIPTION	SHIPPING DESCRIPTION					
<u>TYPES OF DRUMS</u>									
#1 HEADFILLER 20 GAUGE LINED									
#2 HEADFILLER 20 GAUGE LINED									
#1 OPEN HEAD 20 GAUGE LINED									
#2 OPEN HEAD 20 GAUGE LINED									
SCRAP									
ESTIMATED TOTAL NO. <u>120</u> USED METAL DRUMS									

See Reverse Side for Bill of Lading Information
This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

SHIPPER

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT)
CALL CHEMTREC DAY OR NIGHT 1-800-424-9300 IN U.S., PUERTO RICO,
CANADA, VIRGIN ISLANDS OR 202-493-7616 COLLECT

PLACARDS IF APPLICABLE, WERE FURNISHED/AFFIXED.

If car is bad ordered: Please call 1-800-733-1070 between 9:00 A.M. and 4:00 P.M. Central Time.

CARRIER



ADDRESS _____

CITY Rockton STATE IL ZIP 61081

DATE 11-21-03

CUSTOMER PG 76 0015013

[illegible]

REC'D

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29**

Print Name T. J. R. S. A. M.

Signature _____

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"DEALER IN STEEL DRUMS"

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable
RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

PLANT SHIPPING

Carrier Must Show Shipper's
I.D. No. on all Freight Bills

SHIPPED FROM:

 OCCIDENTAL CHEMICAL CORP.
 ARMAND HAMMER BLVD.
 POTTSTOWN, PA 19464

SHIPPER'S I.D. NO.

SR-0004167

DATE SHIPPED

12-03

CUSTOMER P.O.

PO# 4500665391

 3Gmiers
 B. WALKER

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse to the shipper, the consignee shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other charges.

Signature of Consignee

CONSIGNEE TO: (Name or Street Address of Consignee for purpose of notification only)

 SUPERIOR BARRELL & DRUM CO.
 P.O. BOX 741
 GLASSBORO, NJ 08028
 856
 1-609-881-5866

FREIGHT CHARGES

MAIL FREIGHT BILLS TO:

 OCCIDENTAL CHEMICAL CORP.
 FREIGHT PAYMENT CENTER
 P.O. BOX 809050
 DALLAS, TX 75380

SOLD TO:

ROUTING AND CARRIER INSTRUCTIONS:

THEIR PICK UP

GROSS		TARE		SHIPPING WEIGHTS		TEST	SEAL NO./SHIPPING MARKS	CAR VEHICLE OR CONTAINER INITIALS & NO.
				NET				
ITEM	H/M	PACKAGE		NO. OF DESCRIPTION		SHIPPING DESCRIPTION		
TYPES OF DRUMS #1 HEADFILLER 20 GAUGE LINED #2 HEADFILLER 20 GAUGE LINED #1 OPEN HEAD 20 GAUGE LINED #2 OPEN HEAD 20 GAUGE LINED SCRAP ESTIMATED TOTAL NO. 50 ¹⁷⁴ USED METAL DRUMS								

See Reverse Side for Bill of Lading Information
 This is to certify that the above-named materials are properly
 classified, described, packaged, marked and labeled, and are in
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 regulations of the Department of Transportation.

SHIPPER

 PER 

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT)
 CALL CHEMTREC DAY OR NIGHT 1-800-424-9300 IN US, PUERTO RICO,
 CANADA, VIRGIN ISLANDS OR 202-463-7616 COLLECT

PLACARDS IF APPLICABLE, WERE FURNISHED/AFFIXED.

If car is bad order, call 1-800-733-1070 between 9:00 A.M. and 4:00 P.M. Central Time.

CARRIER

PER:

DATE

*Fast Drum Trail**180 Drum*

Occidental Chemical Corporation

PURCHASE ORDER

THIS NUMBER MUST APPEAR ON ALL PACKAGES
TRANSPORTATION PAPERS AND CORRESPONDENCE
PURCHASE ORDER NO. CHANGE NO.
4500680846

ADDRESS CORRESPONDENCE REGARDING THIS ORDER TO:
Klein, R B
OCCIDENTAL CHEMICAL CORP

PO Box 1136

DATE

PAGE

02/06/2004

1 OF 4

POTTSTOWN PA 19464
USA

TEL: 610-327-6515

FAX: 610-327-6639

TO:

DELIVER TO:

SUPERIOR BARREL & DRUM CO INC

Pottstown

PO Box 741

Occidental Chemical Corporation

GLASSBORO NJ 08028

Armand Hammer Blvd

USA

POTTSTOWN PA 19464

USA

PA
ESP

Payment terms: Net 35 Days

Shipping Terms: FOB DEST FRT PREPAY & ADD

We require an order acknowledgment for the following items:

Item	Material Order qty.Unit	Description	Unit Value	Net Value
00010	400 Dollars	RECYCLE TRAILER OF EMPTY DRUMS	1.00	400.00

WORK:

SUBJECT TO THE TERMS AND CONDITIONS ON THE FACE HEREOF AND IN THE
EXHIBITS ATTACHED HERETO, CONTRACTOR SHALL SUPPLY ALL LABOR, MATERIALS,
EQUIPMENT, TOOLS, SUPERVISION, INSURANCE AND ALL ITEMS OF EXPENSE
NECESSARY TO PERFORM THE "WORK" DESCRIBED BELOW, ON THE "WORK SITE" TO
BE PROVIDED BY OWNER AT: POTTSTOWN PLANT SITE.

DESCRIPTION OF WORK:

PROVIDE ALL LABOR, MATERIAL, EQUIPMENT AND SUPERVISION
TO:

DISPOSE OF EMPTY CONTAINERS AS REQUIRED BY THE OWNER.

TIME SCHEDULE:

CONTRACTOR AGREES TO COMMENCE THE WORK AND TO PROCEED WITH THE WORK AS
RAPIDLY AS MAY BE CONSISTENT WITH GOOD WORK PRACTICES AND TO COMPLETE
THE WORK AS REQUIRED.

PRICE:*

FOR FULL PERFORMANCE OF ALL THE WORK, OWNER SHALL PAY CONTRACTOR A PRICE
OF: (AFFIX ATTACHMENT FOR PRICE AND ADDITIONAL PAYMENT TERMS IF OTHER
THAN LUMP SUM).

INVOICE TO:

Occidental Chemical Corporation
Accounts Payable Department
P.O. BOX 1568
Addison, TX 75001-1568

THIS ORDER EXPRESSLY LIMITS ACCEPTANCE TO THE
TERMS ON THE FACE AND AS ATTACHED, AND ANY
ADDITIONAL OR DIFFERENT TERMS PROPOSED BY THE
SELLER ARE OBJECTED TO AND REJECTED UNLESS
EXPRESSLY ASSENTED TO IN WRITING BY THE BUYER

APPROVED: _____

OCCIDENTAL CHEMICAL CORPORATION

ATTN: Pottstown
Occidental Chemical Corporation
A/P Phone Number 800-699-5123

ACCEPTED: _____

SELLER

Occidental Chemical Corporation

PURCHASE ORDER CONTINUATION

TO:

PURCHASE ORDER NO.CHANGE NO.

SUPERIOR BARREL & DRUM CO INC

4500680846

PO Box 741

DATE

PAGE

GLASSBORO NJ 08028
USA

02/06/2004

2 OF 4

Item	Material Order qty.Unit	Description	Unit Value	Net Value
	\$400.00	DOLLARS (U.S.) LUMP SUM		

EXHIBITS:

THE FOLLOWING EXHIBITS ARE ATTACHED HERETO OR HAVE BEEN PREVIOUSLY
MAILED, AND ARE MADE A PART HEREOF:

- EXHIBIT A: GENERAL TERMS AND CONDITIONS
- EXHIBIT B: SAFETY, SECURITY AND HEALTH RULES
- EXHIBIT C: INSTRUCTIONS TO CONTRACTORS
- EXHIBIT D: FACIAL HAIR POLICY SP-75
- EXHIBIT E: EEO COMPLIANCE
- EXHIBIT G: INSURANCE REQUIREMENTS

OWNER'S SITE REPRESENTATIVE:

STAN GINIEWSKI (610) 327-6780

WILL BE THE PRIMARY CONTACT FOR ALL COMMUNICATIONS
BETWEEN THE OWNER AND THE CONTRACTOR.

THE OWNER'S SITE REPRESENTATIVE WILL COORDINATE CONTRACTOR'S ACTIVITIES
WITH THOSE OF OTHER CONTRACTOR'S AND OWNER'S PLANT OPERATIONS.

AUTHORIZATION

ONLY THE INDIVIDUALS NAMED HEREIN ARE AUTHORIZED BY THE BUYER
TO ISSUE RELEASES AGAINST THIS AGREEMENT. ANY ACCEPTANCE BY
SELLER OF RELEASES MADE BY INDIVIDUALS, OTHER THAN THOSE
SPECIFIED, PLACES SELLER AT RISK OF LOST COMPENSATION.

1. PLANT CONTACT STAN GINIEWSKI

SCHEDULE:

THE NATURE OF THIS PROJECT PRECLUDES CONTINUOUS ERECTION, AND/OR
OPERATION. CONTRACTOR SHALL SCHEDULE HIS WORK, TO COORDINATE WITH THE
OVERALL JOB PROGRESS.

CONTRACTOR SHALL NOT IMPEDE NOR IN ANY WAY INTERFERE WITH OWNER'S
OPERATIONS.

CONTRACTOR SHALL BE RESPONSIBLE TO SCHEDULE ALL WORK TO COMPLETE THE
PROJECT WITHIN THE AGREED TIME.

ANY CHEMICAL OR MATERIAL CONTAINING CHEMICALS PER OSHA'S HAZARD
COMMUNICATION REGULATION, BROUGHT ON TO OWNER'S PROPERTY, MUST HAVE A
"MATERIAL SAFETY DATA SHEET" (MSDS). AS A TERM OF THE AGREEMENT
CONTRACTOR WILL SUPPLY OWNER A COPY PRIOR TO USE AND MAINTAIN MSDS'S AT
THE JOB SITE, AVAILABLE FOR REVIEW UPON REQUEST. MSDS WILL BE PROVIDED
BY CONTRACTOR TO:

OCCIDENTAL CHEMICAL CORPORATION
SAFETY DEPARTMENT
PO BOX 699
POTTSTOWN, PA 19464
FAX: (610) 327-6601

OWNER SUPPLIED EQUIPMENT/MATERIAL:
OWNER IS NOT RESPONSIBLE FOR DAMAGE TO, OR THEFT OF, ANY CONSTRUCTION

EQUIPMENT AND/OR TOOLS OWNED OR RENTED BY THE CONTRACTOR, OR ANY OF HIS SUBCONTRACTORS.

Occidental Chemical Corporation

PURCHASE ORDER CONTINUATION

TO:

PURCHASE ORDER NO.CHANGE NO.

SUPERIOR BARREL & DRUM CO INC

4500680846

PO Box 741

DATE

PAGE

GLASSBORO NJ 08028
USA

02/06/2004

3 OF 4

Item	Material Order qty.Unit	Description	Unit Value	Net Value
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QUALITY CONTROL:

ALL WORK AND MATERIALS PROVIDED BY CONTRACTOR, HIS SUBCONTRACTORS AND VENDORS SHALL BE OF GOOD QUALITY, FREE FROM DEFECTS, MEET OWNER'S SPECIFICATION, DRAWING AND CONTRACT AND AT ALL TIMES BE SUBJECT TO INSPECTION BY OWNER'S REPRESENTATIVE.

FAILURE ON THE PART OF OWNER TO DISCOVER OR REJECT WORK NOT IN ACCORDANCE WITH CONTRACT SHALL NOT BE DEEMED AN ACCEPTANCE OF THE WORK OR WAIVER OF DEFECTS, NOR RELIEVE THE CONTRACTOR OF OBLIGATIONS TO CONFORM TO CONTRACT REQUIREMENTS.

HAZARDOUS WASTE:

AS A RESULT OF THE WORK EXECUTED UNDER THIS CONTRACT, HAZARDOUS WASTES (CONTAMINATED SOIL AND/OR DEMOLITION DEBRIS) MAY BE SENT TO DESIGNATED DISPOSAL SITE. OWNER WILL CLASSIFY THE TYPE OF WASTE AND PAY DISPOSAL FEES. EXCAVATION, LOADING AND TRANSPORTATION COSTS MUST BE INCLUDED IN CONTRACTOR'S WORK.

CLEAN UP:

CONTRACTOR WILL PARTICIPATE IN OWNER'S "CONSTRUCTION CLEAN-UP PROGRAM". ALL DEBRIS MUST BE PROPERLY DISPOSED OF IN A TIMELY MANNER AND IN ACCORDANCE WITH ALL FEDERAL, STATE, LOCAL AND PLANT SPECIFIC REGULATIONS.

CONFLICT OF DOCUMENTATION:

IN CASE OF CONFLICT, THE ORDER OF PRECEDENCE SHALL BE AS FOLLOWS IN RESOLVING SUCH CONFLICT: THE PURCHASE ORDER FACE, EXHIBIT A AND EXHIBIT B, ANY OTHER EXHIBITS, THE DRAWINGS AND SPECIFICATIONS, THE MODEL.

CONTRACTOR INVOICING:

ALL INVOICES MUST SHOW THE PURCHASE ORDER NUMBER, RELEASE NUMBER, AND ANY OTHER RELEVANT NUMBERS ASSOCIATED WITH THE WORK.

CONTRACT ACKNOWLEDGEMENT:

THE TERMS AND CONDITIONS SHALL APPLY AND A SIGNED ACKNOWLEDGEMENT OF THE ORDER MUST BE RETURNED WITHIN 7 DAYS OF RECEIPT OF THE WRITTEN PURCHASE ORDER.

FIDUCIARY RESPONSIBILITY:

CONTRACTOR RECOGNIZES AND UNDERSTANDS THIS CONTRACT COULD BE SUBJECT TO ABUSE. CONTRACTOR UNDERTAKES A FIDUCIARY RESPONSIBILITY TO MAINTAIN THIS CONTRACT AND ASSOCIATED SERVICES AT THE HIGHEST ETHICAL STANDARDS AND WITHOUT PREFERRED TREATMENT TO ANY OF OWNER'S EMPLOYEES. IT IS CONTRACTOR'S RESPONSIBILITY TO BRING TO THE ATTENTION OF OWNER'S MATERIALS MANAGEMENT DEPARTMENT ANY ABUSES TO SAME. CONTRACTOR RECOGNIZES FAILURE TO FOLLOW THE SPIRIT AND INTENT OF FIDUCIARY RESPONSIBILITY COULD MEAN TERMINATION OF CONTRACT.

NOTIFICATION:

SERVICES OF ALL NOTICES UNDER THIS PURCHASE ORDER SHALL BE IN WRITING TO SITE REPRESENTATIVE OF CONTRACTOR OR OWNER OR MAILED TO THE PARTY INVOLVED AT ITS RESPECTIVE ADDRESS SET FORTH ON THE FRONT OF THIS ORDER, OR AT SUCH ADDRESS AS SUCH PARTY MAY PROVIDE IN WRITING FROM TIME TO

Occidental Chemical Corporation

PURCHASE ORDER CONTINUATION

TO:

PURCHASE ORDER NO.CHANGE NO.

SUPERIOR BARREL & DRUM CO INC

4500680846

PO Box 741

DATE

PAGE

GLASSBORO NJ 08028
USA

02/06/2004

4 OF 4

Item	Material Order qty.Unit	Description	Unit Value	Net Value
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TIME IN ACCORDANCE WITH THIS NOTICE PROVISION. ANY SUCH NOTICE MAILED TO SUCH ADDRESS SHALL BE EFFECTIVE WHEN DEPOSITED IN THE UNITED STATES MAILING DULY ADDRESSED WITH POSTAGE PREPAID.

SAFETY:

CONTRACTOR AGREES TO ENFORCE OWNER'S LOCAL FACILITY SAFETY AND LOSS PREVENTION REGULATIONS AND APPLICABLE GOVERNMENT REGULATIONS. CONTRACTOR IS EXPECTED TO EXERT PRIMARY CONTROLS THROUGH HIS LINE SUPERVISION TO OBTAIN DESIRED PERFORMANCE. FAILURE TO OBSERVE AND ENFORCE THESE REGULATIONS AND STANDARDS WILL BE CAUSE FOR TERMINATION OF THIS CONTRACT.

CONTRACTOR WILL SUPPLY TO THEIR EMPLOYEES ALL SAFETY EQUIPMENT AND PERSONAL PROTECTIVE EQUIPMENT REQUIRED FOR THE SAFE PERFORMANCE OF THE WORK.

NO OPEN FLAMES, SMOKING, CUTTING, WELDING OR OPERATION OF INTERNAL COMBUSTION ENGINES WILL BE ALLOWED IN THE AREA WITHOUT SPECIFIC "HOT WORK PERMITS" ISSUED BY OWNER.

CONTRACTOR SHALL FULLY REVIEW AND MAINTAIN FAMILIARITY WITH "PROCESS SAFETY INFORMATION" WHICH IS ALSO AVAILABLE FROM OWNER'S SITE REPRESENTATIVE

CONTRACTOR SHALL REVIEW AND BECOME FAMILIAR WITH, AND SHALL ABIDE BY, OWNER'S POLICIES REGARDING HARASSMENT AS STATED IN OXYCHEM HUMAN RESOURCE POLICY 83:80 (DATED 05/15/95) AVAILABLE FROM OWNER'S SITE REPRESENTATIVE.

CONTRACTOR SHALL BE RESPONSIBLE FOR ASSURING THAT ALL THEIR SUB-CONTRACTORS MEET THE SAME MINIMUM IIR, EMR, AND INSURANCE REQUIREMENTS THAT THE OWNER REQUIRES OF ITS PRIME CONTRACTOR.

INSURANCE:

CONTRACTOR MUST SUBMIT OR HAVE ON FILE CERTIFICATES OF INSURANCE EVIDENCING COVERAGE AS CALLED OUT IN THE INSURANCE PARAGRAPH OF THE GENERAL TERMS AND CONDITIONS, EXHIBIT A. OWNER SHALL BE NAMED "ADDITIONAL INSURED", AND A WAIVER OF SUBROGATION IN PLACE WITH REGARD TO WORKER'S COMPENSATION.

ENVIRONMENTAL GUIDELINES FOR CONTRACTORS:

CONTRACTOR SHALL FOLLOW ALL OF OWNER'S "ENVIRONMENTAL GUIDELINES FOR CONTRACTORS" RELATED TO LOSS AND ENVIRONMENTAL INCIDENTS AS LISTED IN THE SAFETY AND ENVIRONMENTAL RULES AND REGULATIONS PAMPHLET AVAILABLE FROM OWNER'S SITE REPRESENTATIVE.

Deliver To: GINIEWSKIS

Delivery Location: LOAD AT GROUNDS BLDG.

Delivery Date: 02/06/2004

Total net value excl. tax USD

400.00

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable
 RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

PLANT SHIPPING
 Carrier Must Show Shipper's I.D. No. on all Freight Bills

SHIPPED FROM:

REQ # 10967170

SHIPPER'S I.D. NO.

SR-0005015

DATE SHIPPED

2-10-04

OCCIDENTAL CHEMICAL CORP.

ARMAND HAMMER BLVD.

POTTSTOWN, PA 19464

 Subject to Section 7 of Conditions of applicable bill of lading, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment or freight and all other lawful charges.

(Signature of Consignor)

FREIGHT CHARGES

S: GENIEWSKI

CUSTOMER P.O.

4500680846

MAIL FREIGHT BILLS TO:

CONSIGNEE TO: (Mail or Street Address of Consignee for purpose of notification only)

SUPERIOR BARRELL AND DRUM CO.

P.O. BOX 741

GLASSBORO, NJ 08028

OCCIDENTAL CHEMICAL CORP.

FREIGHT PAYMENT CENTER

P.O. BOX 809050

DALLAS, TX 75380

1-609-881-5866

SOLD TO:

ROUTING AND CARRIER INSTRUCTIONS:

THEIR PICK UP

700-43-038

506719

GROSS	SHIPPING WEIGHTS TARE	NET	SEAL NO./SHIPPING MARKS	CAR VEHICLE OR CONTAINER INITIALS & NO.

PACKAGE NO. OF	DESCRIPTION	SHIPPING DESCRIPTION

#1 HEADFILLER 20 GAUGE LINED

#2 HEADFILLER 20 GAUGE LINED

#1 OPEN HEAD 20 GAUGE LINED

#2 OPEN HEAD 20 GAUGE LINED

SCRAP

USED METAL DRUMS

Estimated total 182

 See Reverse Side for Bill of Lading Information
 This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

SHIPPER

 FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT)
 CALL CHEMTREC DAY OR NIGHT 1-800-424-9300 IN US, PUERTO RICO,
 CANADA, VIRGIN ISLANDS OR 703-527-3887 COLLECT

PLACARDS IF APPLICABLE WERE FURNISHED/AFFIXED.

CARRIER

PER:

DATE

NAME John

ADDRESS _____

CITY 4073 STATE VA ZIP 22004

DATE 4-10-61

CUSTOMER PO 75000 80846

[illegible]

REC'D

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name _____

Signature _____

***With regard to most regulated residues, EPA's 40 CFR 261.7 says:**

"A container... is empty if:

(I) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating.

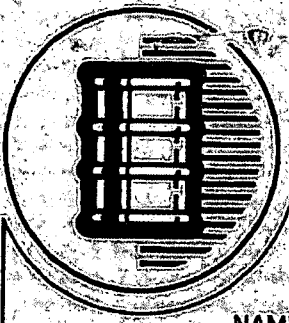
(II) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container.

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container...has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

DOT § 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

"DEALER IN STEEL DRUMS"



SUPERIOR BARREL AND DRUM CO. INC.
 P.O. BOX 741 • GLASSBORO, NJ 08028 • (609) 881-5866

NAME Oxycel

ADDRESS _____

CITY _____ STATE _____ ZIP _____

DATE 12-19-04

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
77	Empty Drum for Destruction		
174			

REC'D [Signature]

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29**

Print Name [Signature]

Signature [Signature]

*With regard to most regulated residues, EPA's 40 CFR 261.7 says:

"A container... is empty if:

(I) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and

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"DEALER IN STEEL DRUMS"



SUPERIOR Barrel and Drum Co., Inc.

New - Used - Reconditioned

218 CRAFTON AVENUE PITMAN, N.J. 08071

(608) 589-8593

SPICER

SECRET

[Handwritten signature]

[illegible]

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - Not Negotiable
RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading.

PLANT SHIPPING

Carrier Must Show Shipper's
I.D. No. on all Freight Bills

SHIPPED FROM:

OCCIDENTAL CHEMICAL CORP.
ARMAND HAMMER BLVD.
POTTSTOWN, PA 19464

SHIPPER'S I.D. NO.

SR-0004165

DATE SHIPPED

CUSTOMER P.O.

B. WALKER

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

CONSIGNEE TO: (Mail or Street Address of Consignee-For purpose of notification only)

SUPERIOR BARRELL & DRUM CO.
P.O. BOX 741
GLASSBORO, NJ 08028

FREIGHT CHARGES

MAIL FREIGHT BILLS TO:

OCCIDENTAL CHEMICAL CORP.
FREIGHT PAYMENT CENTER
P.O. BOX 809050
DALLAS, TX 75380

SOLD TO:

ROUTING AND CARRIER INSTRUCTIONS:

THEIR PICK UP

GROSS		TARE		SHIPPING WEIGHTS		TEST		SEAL NO./SHIPPING MARKS		CAR VEHICLE OR CONTAINER INITIALS & NO.	
ITEM	H/M	PACKAGE		NO. OF DESCRIPTION		SHIPPING DESCRIPTION					
TYPES OF DRUMS											
#1 HEADFILLER 20 GAUGE LINED											
#2 HEADFILLER 20 GAUGE LINED											
#1 OPEN HEAD 20 GAUGE LINED											
#2 OPEN HEAD 20 GAUGE LINED											
SCRAP											
ESTIMATED TOTAL NO. <u>110</u> USED METAL DRUMS											

See Reverse Side for Bill of Lading Information
This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation, according to the applicable regulations of the Department of Transportation.

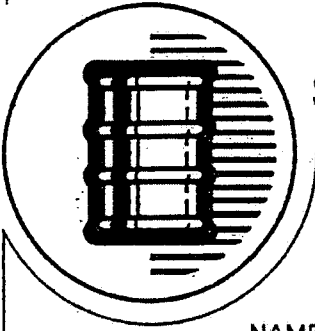
SHIPPER

FOR CHEMICAL EMERGENCY (SPILL, LEAK, FIRE, EXPOSURE, OR ACCIDENT)
CALL CHEMTREC DAY OR NIGHT 1-800-424-9300 IN US, PUERTO RICO,
CANADA, VIRGIN ISLANDS OR 202-463-7616 COLLECTPLACARDS IF APPLICABLE, WERE FURNISHED/AFFIXED.
If car is bed ordered: Please call 1-800-733-1070 between 9:00 A.M. and 4:00 P.M. Central Time.

CARRIER

DEC.

DATE



SUPERIOR BARREL AND DRUM CO. INC.
218 CRAFTON AVE. • PITMAN, NJ 08071 • (609) 589-6593

NAME *Oce...*

ADDRESS _____

CITY _____

STATE _____

ZIP _____

DATE _____

CUSTOMER PO _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
8	Heil Bar (Plastic)	8.00	64.00
42	#2 H.F.	1.50	63.00
2	#2 O.H.	50	1.00
28	Scrap		64.00
70			100.00

REC'D. *H. Ray***EMPTY DRUM CERTIFICATION**

I hereby certify that these drums are "empty" as that term is defined in the National Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Print Name *Richard V. Schellman*Signature *R. Schellman*

*With regard to most regulated residues, EPA's 40 CFR 261.7 says:

"A container... is empty if:

(I) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating.

and

(II) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container..."

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

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**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

"DEALER IN STEEL DRUMS"

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Occidental Chemical Holding
5005 Lyndon B. Johnson Freeway #2200
Dallas, Texas 75244
Attn: Raghaven Rajali

2. Article Number

(Transfer from service label)

7012 1640 0001 8519 4092

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

X 

☒ Agent

☐ Addressee

B. Received by (Printed Name)

CSIPRASUTH

C. Date of Delivery

6-16-14

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Bonnie Hriczko
U.S. Environmental Protection Agency
Removal Action Branch-(MS-211)
Building 205
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

